



Seattle Office of
Inspector General

Surveillance Technology Usage Review CopLogic (2022 & 2023)

As Required by Seattle Municipal Code 14.18.060

September, 2024

Office of Inspector General

City of Seattle

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Purpose

Surveillance Ordinance Requirement

Per Seattle Municipal Code 14.18.060, OIG is required to annually review the Seattle Police Department’s (SPD) compliance with the requirements of Chapter 14.18 in its use of surveillance technologies.

CopLogic No Longer a Surveillance Technology

In September 2024, Seattle IT removed Coplogic from the City’s Master List of Surveillance Technologies. While OIG is issuing this final annual report pursuant to SMC 14.18.060, the report will not include recommendations related to compliance with the relevant Surveillance Impact Report (SIR). Additionally, any outstanding recommendations from prior Annual Usage Reviews will be closed.

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1 https://clerk.seattle.gov/~CFS/CF_323176.pdf

Technology Description

The Desk Officer Reporting System – known primarily as “Coplogic” – is a web-based program enabling the public to submit information on crimes to SPD. Its software is a LexisNexis product and is available for mobile and desktop devices. Coplogic is designed to have two submission interfaces, for individual members of the public and for retailers.

Public Interface (PI):

The submission portal for individuals reporting non-emergency incidents where the suspect is unknown.

Individuals submit reports through the **Public Interface (PI)** that are non-emergency in nature when no information is known about a suspect. These reports may be used for insurance purposes, where proof of police reporting is necessary. SPD automates submission of these reports to eliminate the need for some individuals to call 9-1-1 or physically visit a precinct office. In 2024, SPD replaced the Coplogic PI with the Web Incident Reporting Tool, though the Retail Theft Interface of Coplogic remains operational.

Retail Theft Interface (RTI):

Submission portal for retailers reporting shoplifting and other incident.

Retail Theft Interface (RTI) is intended for retailers to submit reports, as the RTI is a component of the **Retail Theft Program (RTP)**. SPD founded the RTP in 1989 to streamline the reporting of shoplifting or criminal trespassing incidents. RTP-participating retailers report shoplifting or trespassing by submitting details through a Security Incident Report by mail or through the RTI of Coplogic.

Retail Theft Program (RTP): An initiative to streamline retailers’ reporting of particular offenses.

Retailers may only use the RTI if they are part of the RTP. To participate, retailers must have a unique security identification number assigned by SPD and participate in SPD-led training because the RTI allows retailers to submit suspects’ names and other personally identifiable information whenever individuals are reported for shoplifting or trespassing.

RTP-participants: Retailers that are part of the RTP.

Only retailers that participate in the RTP can submit reports through the RTI. Throughout this report “**RTP-participants**” refers to those retailers belonging to the RTP; the broader population of “retailers” refers to all retailers regardless of whether they actively participate in the RTP. SPD dedicates certain personnel – the Internet-Telephone Response Unit (I-TRU) – to review and accept reports received through Coplogic.

SECTION A

2022 & 2023 Surveillance Technology Usage

SMC 14.18.060, § A:
How surveillance technology has been used, how frequently, and whether usage patterns are changing over time.

Over the past four years, use of Coplogic generally decreased. The highest number of reports received in a year occurred in 2020, while the least number of reports received in a year occurred in 2023. In addition to the decreasing number of reports per year, the number of unique addresses submitting at least one report generally decreased over the past four years (see Figure 1 below).

Figure 1. CopLogic Submissions per Year

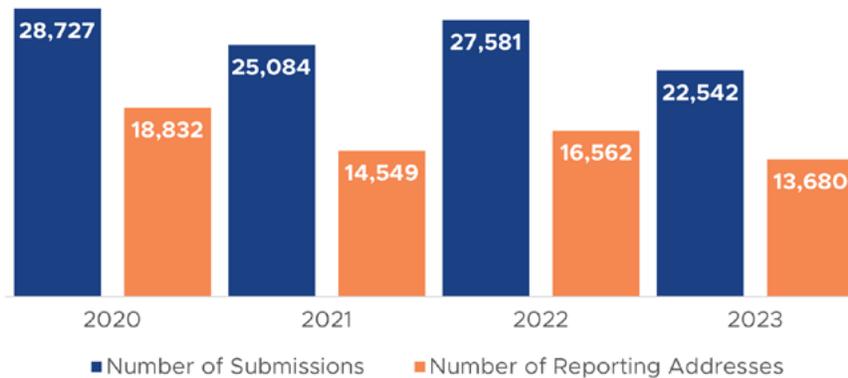


Figure 1 Depicts the Number of Reports Submitted Annually and Number of Unique Reporting Addressing Annually Between 2020 and 2023

Coplogic users tended to fall into two categories: low- or high-utilizers. Most reporting addresses submitted either one or two reports annually in 2022 and 2023; however, some addresses – mostly retailers – submitted as many as 135 reports in a year. Retailers accounted for seven of the top ten highest reporting addresses of 2022 and 2023, and these seven retailers submitted a combined 875 reports (or 1.7% of all reports).² As the table below indicates, retailer reports accounted for about 5% of all reports and came from 280 addresses. Consequently, low-utilizing addresses tended to be individuals, while high-utilizing addresses tend to be retailers.

Table 1: Submissions From Unique Addresses by User Type, 2022 & 2023

User Type	Number of Addresses	Number of Reports
Identified Retailers	280 (1.0%)	2,633 (5.3%)
Individuals (Non-Retailers)	25,910 (99.0%)	47,490 (94.7%)
Total	26,190	50,123

² These high-volume retailers are geographically diverse and not concentrated in any one area of Seattle.

Retailers' Usage

Not all Seattle retailers used the RTI, and even those retailers participating in the RTP could submit reports through both the RTI and the PI.³ Compared to other years, retailers in 2022 were more likely to submit reports through the PI (see Figure 2 below). Personnel from the I-TRU stated that three factors likely impacted the use of the RTI in recent years, which accounts for why more retailers turned to using the PI or discontinued their use of Coplogic altogether.

First, social distancing policies at major retail stores that arose in response to the COVID-19 pandemic affected how and if loss prevention officers (LPOs) physically interacted with individuals suspected of trespassing or shoplifting. Second, retailers realized fewer benefits to reporting because misdemeanor and felony thefts during the pandemic were rarely prosecuted. Third, high turnover for LPOs and other retail staff may have led to the loss of institutional knowledge about Coplogic and how to report through the RTI. Given the reporting requirements of the RTI and these other potential factors, some retailers may have chosen to submit reports through the PI instead. Consequently, I-TRU personnel reported that retailer submissions made through the PI were generally ineligible for prosecution.⁴

Figure 2. Retailer Submissions Submitted Through Public Interface



Figure 2 Depicts the Rolling Average Number of Weekly Retailer Reports Submitted Through the Public Interface

- 3 Individuals, however, could only submit Coplogic reports through the PI.
- 4 Reports submitted through the RTI were required to include a legally binding attestation about the accuracy of the allegations.

In addition to the greater proportion of retailer reports submitted to the PI, OIG also observed a downward turn in the number of participating retailers. In 2022 there were 216 unique retailer locations using Coplogic; however, in 2023 there were about 80 fewer retailer locations using Coplogic.⁵ I-TRU personnel report that they communicated their concerns about the ineligibility of reports submitted through the PI to retailers using that interface. I-TRU personnel report that this communication is one reason there may have been a drop in the number of reporting retailers. They also reported other potential reasons, such as the general trend of downtown retail locations closing since 2020 and their own observations that some retailers have discontinued using Coplogic altogether.

RTI Reports on High- and Low-Level Thefts

The SIR and RTP documentation did not provide clear guidance for retailers reporting “high-level” thefts. The SIR states that not all thefts could be submitted through the RTI and only “low-level” thefts could be reported. However, the SIR did not define “low-level” thefts in the context of the RTI.⁶ The RTP Manual states that a Security Incident Report should not be used for felony thefts. RCW 9A.56.050 defines misdemeanor thefts as thefts not exceeding \$750, while RCW 9A.56.040 categorizes thefts at or above \$750 (but less than \$5,000) as a class C felony. OIG found that 156 of 1,256 RTI theft-related reports (or about 12%) reported attempted felony thefts valued at \$750 or more.

5 In 2020 there were 60 retailer locations using Coplogic. In 2021, there were 134 retailer locations. 2022 had the highest number of participating retailer locations with 216. In 2023 there were 141 retailer locations.

6 The only definition for “low-level” thefts in the SIR appeared to be for community members using the PI. The SIR stated: “Theft of property valued at less than \$500 may be reported using Coplogic. The online reporting tool is designed to allow community members to report certain low-level property crimes only. When the value of stolen property exceeds \$500 it is more appropriate for an officer to respond in person to take the crime report.”

Figure 3. Reported Values of Goods Attempted Stolen by Store Type, 2022 & 2023 Population: 1,256 RTI Reports

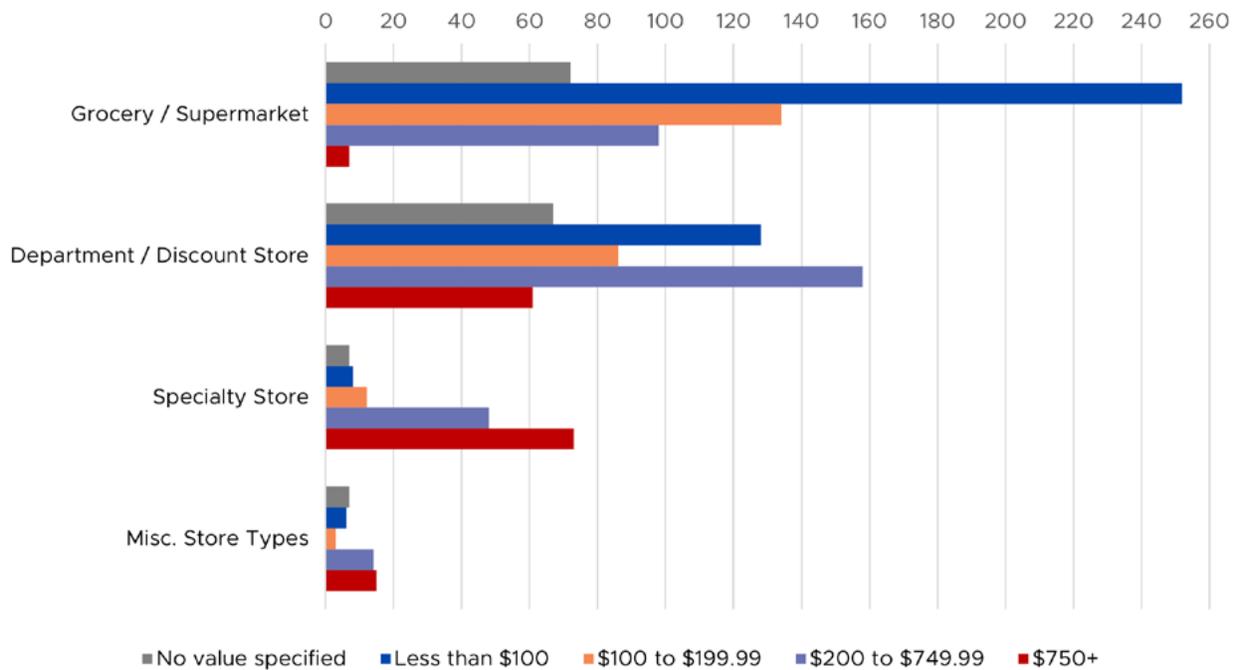


Figure 3 depicts the distribution of reported values of attempted stolen goods by self-reported store type. Grocery / Supermarket reports accounted for 44.8% of all RTI submissions. Department / Discount Store reports accounted for 39.8% of all RTI submissions. Specialty Store reports accounted for 11.8% and Misc. Store reports accounted for 3.6% of all RTI submissions. Drug stores, paid parking lots/garages, and other infrequently used store types comprise the Miscellaneous Store type category.

SECTION B

Data Sharing with External Partners and Other Entities

SMC 14.18.060, § B:
How often surveillance technology or its data are being shared with other entities, including other governments in particular.

Data from Coplogic were never given directly to outside agencies without first being added to the records management system (RMS). At no point did external entities have direct access to reports in Coplogic or the RMS. These data may be shared with a variety of sources including, but not limited to, prosecuting attorneys' offices, insurance companies, courts, other law enforcement agencies, and members of the public through public disclosure requests.

SECTION C

Data Management and Safeguarding of Individual Information

SMC 14.18.060, § C:

How well data management protocols are safeguarding individual information.

120-Day Retention Period

OIG observed an issue with the 120-day retention period for some reports submitted through Coplogic. The SIR stated that reports “generated in the Coplogic system are imported into SPD’s records management system and then auto-deleted from the LexisNexis servers after 120 days.” However, OIG identified reports that were older than 120 days. OIG notified personnel at the I-TRU, who confirmed the auto-deletion error and purged those past-due reports.

SECTION D

Impact on Civil Liberties and Disproportionate Effects on Disadvantaged Populations

SMC 14.18.060, § D:

How deployment of surveillance technologies impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations (...).

Risk of Fraudulent/Malicious Reports

During the community engagement period of the SIR process, community members raised concerns that false or malicious reports could be used to target disadvantaged communities. At several points in the SIR, SPD addressed this concern with the following language:

“Because the use of this technology is an opt-in decision by its community users and crimes with known or describable suspects are not reportable through Coplogic, the risks of improper or biased usage are limited. The system does not allow for reports of crimes with known or describable suspects. All information, once reviewed by authorized SPD employees, is electronically transferred into SPD’s records management system”.

OIG found that while SPD’s description of system allowances is technically accurate, SPD continued to receive and accept reports through Coplogic’s Public Interface (PI) that included the names of suspects in report narratives. OIG found 400 unique individuals’ names were imported from Coplogic into the RMS as suspects (231 in 2022 and 169 in 2023).⁷

⁷ Retail-related reports submitted through the PI were not included in this figure. Names present in reports from both 2022 and 2023 are counted only once.

Suspects' Information Included in Report Narratives

Coplogic does not contain fields for individual members of the public to identify suspects. Every question field is structured as yes or no. Answering “yes” to any questions resulted in a red text warning indicating that the user must call the non-emergency line, as demonstrated in Image 1 below:

Incident Type ✓

Theft [Update](#)

Definition

- The taking of property without permission or the receiving of services without the intention of paying.
- Does not include the taking of vehicles or vehicle parts.
 - If reporting the theft of a vehicle, call 9-1-1 immediately.
- Does not include the withholding of wages.

Examples

- Package theft, unpaid restaurant tab, stolen bicycle, etc.

Confirm Question(s)

I have the name of a possible suspect or information likely to lead to the suspect's identification (e.g., security camera footage, a name and address associated with the fraudulent act, etc.).
 Yes No

WARNING: This crime is not eligible for online reporting because you have suspect information. Please call the non-emergency reporting line at 206-625-5011 to file your report.

Was a motor vehicle, licensed trailer, license plates, or temporary license tag stolen? Or was there an attempt to steal a motor vehicle or licensed trailer?
 Yes No

Are you reporting the theft of firearms, narcotics or other federally controlled items?
 Yes No

Did this incident involve physical violence or threats?
 Yes No

Though the PI did not include fields for accepting suspect names, it did allow users to type a narrative of the incident. OIG drew a random sample of 100 reports submitted through the PI during 2022 or 2023, which represented a quarter of the 400 individuals whose names were coded as suspects in the RMS. In 93 of 100 sampled reports, individuals' names were included in the reports' narrative sections.

Almost all sampled report authors included alleged suspects' first/last names in their narratives, and some report authors also included perceived demographic characteristics (such as race, ethnicity, and sex) about their reported suspect(s). Notably, in nine of the 100 sampled cases, SPD personnel associated Coplogic reports with ongoing/future investigations or with other incident/offense reports.

PI Report Approval Process

Officers of the I-TRU reviewed and accepted Coplogic reports. After acceptance, reports were imported into the RMS. OIG reviewed internal controls and were unable to determine how and why names provided in the narrative of a report through the PI were stored into Mark43 and coded as suspects. Relevant SPD personnel reported that they did not modify report authors' narrative statements but were unable to identify how those names were coded into the RMS. Regardless, widespread acceptance of reports that include 'known or describable suspects' appeared counter to the intended use of this technology as SPD described in the SIR.

Potential Racial Disproportionality in Retailer Submissions

In the inaugural review of this technology, OIG observed potential racial disproportionality in a limited sample of reports submitted through the RTI in 2021. For this report, OIG reviewed all retailer reports submitted in 2022 and 2023.

Figure 4. Race of 541 Unique Individuals Identified in RTI Reports 2022 & 2023

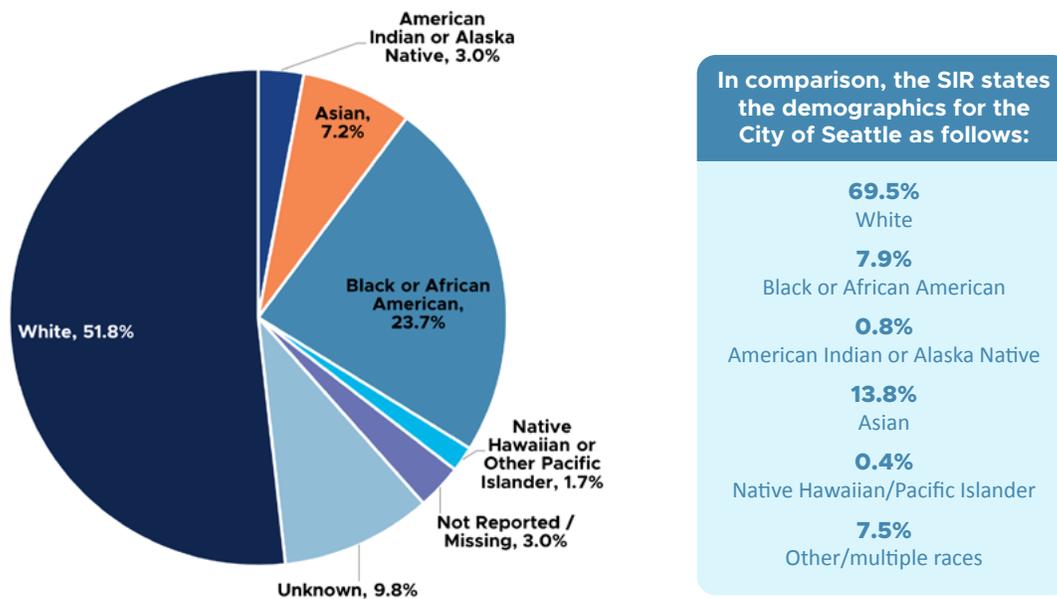


Figure 4 Depicts the distribution of alleged suspects' race as reported by retailers using the RTI

Data from 2022 and 2023 showed that Black or African American individuals were reported by retailers at about three-times their share of the city demographics. This alone did not support a conclusion of disparity among retailers using Coplogic.⁸ However, studies on shopping suggest that shoplifting occurs at proportional rates across demographics, and that Black shoppers in particular experience discrimination in retail settings.⁹

Though the potential for broad racial bias among retailers exists and may be demonstrated in part through Coplogic data, it is unclear that Coplogic as a reporting technology had any more impact than a retailer's participation in the RTP or reporting shoplifting through a non-emergency number.

SECTION E

Complaints, Concerns and Other Assessments

SMC 14.18.060, § E:

A summary of any complaints or concerns received by or known by departments about their surveillance technology and results of any internal audits or other assessments of code compliance.

Office of Police Accountability Complaints

No complaints submitted to OPA in 2022 or 2023 pertained to Coplogic.

Customer Service Board Comments

OIG identified at least twenty relevant complaints filed in 2022 with the Customer Service Bureau (CSB) connected to Coplogic. Those complaints can be categorized as follows:

- 1) complaints about the types of crimes reportable through Coplogic;
- 2) any outages or error messages returned by the Coplogic website when filing a report; and
- 3) the perceived responsiveness of SPD or success in submitting a report.

⁸ An analysis of racial bias among retailers would require knowledge of the demographics of stores' visitors and is beyond the scope of this review.

⁹ For example, a 2008 report using a nationally representative sample of more than 43,000 respondents found that individuals self-report shoplifting at rates roughly proportional according to their race, Carlos Blanco, M.D., Ph.D. et. al., "Prevalence and Correlates of Shoplifting in the United States: Results From the National Epidemiologic Survey on Alcohol and Related Conditions (NESARC)", *American Journal of Psychiatry*, Vol 165 no. 7 (2008): 905-913. Furthermore, sociologist Cassi Pittman identified through an ethnographic study from 2020 that Black shoppers frequently encounter racial discrimination while shopping. Pittman concludes that these experiences of retail racism affect how often and where Black individuals shop. Cassi Pittman, "Shopping while Black': Black consumers' management of racial stigma and racial profiling in retail settings," *Journal of Consumer Culture*, Vol. 20, no. 1 (2020): 3-22.

Customers reported to the CSB a variety of crimes in which they allege they were unable to submit through Coplogic, including assault, theft, trespassing, stolen vehicle, reckless endangerment, and hate crimes. Four complaints identified concerns about either SPD’s responsiveness to an electronically filed police report or if their report was accepted/ properly submitted.

Internal Audits or Assessments

No internal audits or assessments were conducted on this technology in 2022 or 2023.

SECTION F

Total Annual Costs

SMC 14.18.060, § F:
Total annual costs for use of surveillance technology, including personnel and other ongoing costs.

SPD reported that annual costs for this technology in 2022 totaled to approximately \$110,000. This included roughly \$98,000 in personnel costs and \$11,190.06 in licensing/maintenance costs to LexisNexis. In 2023, Seattle IT reported \$11,525.76 in licensing/maintenance costs to LexisNexis. Personnel costs in 2023 could not be determined.

APPENDIX A: Management Response

The Seattle Police Department appreciates the review by the Officer of the Inspector General. SPD is pleased to have been able to create a more stable and user-friendly on-line reporting system, however, there is more work to be done. SPD intends to add languages and accessibility options to the system and expand the call types available for on-line reporting, possibly to include felony-level property crimes. Additionally, the Retail Theft module should be completely overhauled and replaced to make it more functional for SPD and the business community.

However, resources and budget constraints do not allow further development at this time.

Non-Audit Statement This review was not conducted under Generally Accepted Government Auditing Standards (GAGAS); however, OIG has followed GAGAS standards regarding the sufficiency and appropriateness of evidence.